

Message

From: Pomajzl, Mark [mark.pomajzl@nebraska.gov]
Sent: 3/1/2019 3:45:39 PM
To: Hackett, Shawn [hackett.shawn@epa.gov]
CC: Ex. 7A
Subject: RE: AltEn sample report for NDA wetcake sample
Attachments: ATT00001.txt

Most recent result from Tim Creger... Thank you for your time, Please let me know what you think.

Thank you

Mark Pomajzl
Program Specialist
Wastewater NPDES Compliance Unit

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<http://deq.ne.gov>

From: Creger, Tim <tim.creger@nebraska.gov>
Sent: Friday, March 01, 2019 7:25 AM
To: Pomajzl, Mark <mark.pomajzl@nebraska.gov>
Cc: Valentine, Kara <kara.valentine@nebraska.gov>; Anderson, Reuel <reuel.anderson@nebraska.gov>; Ewoldt, Cay <Cay.Ewoldt@nebraska.gov>; Pracheil, Brad <brad.pracheil@nebraska.gov>; Holsten, Jason <jason.holsten@nebraska.gov>; Edwards, Jeffery <jeffery.edwards@nebraska.gov>; Vance, Buzz <buzz.vance@nebraska.gov>; Zimmerman, Tammy <tammy.zimmerman@nebraska.gov>; Storant, Bob <bob.storant@nebraska.gov>; Breinig, Amelia <Amelia.Breinig@nebraska.gov>
Subject: RE: AltEn sample report for NDA wetcake sample

To those on the list involved in the AltEn waste issue, here is the final report of analysis from the sample NDA collected on 1/29/19. The concentrations of neonitroinoid insecticides are high enough to be of concern, as EPA has indicated in their registration review these compounds are potentially bioaccumulative and toxic to non-target invertebrates at very low concentrations. Those products on the report below are clothianidin, imidacloprid, and thiamethoxam. The other products found (other than the herbicide glyphosate) are registered as fungicides and also used as seed treatments. The labels for those products when applied in-season as a foliar application caution the user about off-site movement into surface water, as they are toxic to aquatic invertebrates. My conclusions from this single sample would be that the seed treatment chemicals are not decomposed during the distillation process at AltEn, they are possibly concentrated into the waste wetcake byproduct, and they are of high enough concentrations to be a concern that surface runoff into nearby streams could pose ecological impacts on non-vertebrate species. I do not know much about the water use of AltEn's plant, but if they generate waste water off of the distillation process, it could be contaminated as well.

I would be able to meet with you all to discuss this further next week on Thursday or Friday, as I am out the first three days of the week to a national meeting in Alexandria, VA.

Tim Creger

Pesticide/Fertilizer Program Manager | ANIMAL & PLANT HEALTH PROTECTION

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Tim.creger@nebraska.gov

From: Pomajzl, Mark <mark.pomajzl@nebraska.gov>

Sent: Thursday, February 28, 2019 9:19 AM

To: Creger, Tim <tim.creger@nebraska.gov>

Subject: RE: AltEn sampling meeting

Hi Tim,

Could I have a copy of the lab results, I just want to compare your results to AltEn's. Also will AltEn receive any of these results?

Thank you

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Wastewater NPDES Compliance Unit

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